

**UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY**

**FEE APPLICATION COVER SHEET FOR THE
PERIOD JUNE 1, 2023 THROUGH JUNE 30, 2023**

Debtor: LTL Management LLC

Applicant: Wollmuth Maher & Deutsch LLP

Case No.: 23-12825-MBK

Client: LTL Management LLC

Chapter: 11

Case Filed: April 4, 2023 (the "Petition
Date")

**SECTION 1
FEE SUMMARY**

X Monthly Fee Statement No. 3 or ☐ Final Fee Application

Summary of Amounts Requested for the Period from June 1, 2023 through June 30, 2023 (the "Third Statement Period").

Total Fees:	\$413,196.75
Total Disbursements:	\$12,103.99
Total Fees Plus Disbursements:	\$425,300.74
Minus 20% Holdback of Fees:	\$82,639.35
Amount Sought at this Time:	\$342,661.39

	<u>FEEs</u>	<u>EXPENSEs</u>
Total Previous Fees Requested:	<u>\$804,352.00</u>	<u>\$7,349.90</u>
Total Fees Allowed to Date:	<u>\$0</u>	<u>\$0</u>
Total Retainer (If Applicable):	<u>\$0</u>	<u>\$0</u>
Total Holdback (If Applicable):	<u>\$160,870.40</u>	<u>\$0</u>
Total Received by Applicant:	<u>\$643,481.60</u>	<u>\$7,349.90</u>

Name of Professional & Title	Year Admitted	Hours	Rate	Fees
Paul R. DeFilippo, Esq., Partner	1978	44.0	\$975	\$41,535.00
James N. Lawlor, Esq., Partner	1992	129.6	\$910	\$113,613.50
Nicole C. Rende, Esq., Associate	2019	0.8	\$635	\$508.00
Joseph F. Pacelli, Esq., Associate	2020	185.2	\$635	\$112,966.50
Logan R. Leonard, Esq., Associate	2022	149.5	\$440	\$63,734.00
Stephanie A. Weaver, Esq., Associate	2023	136.5	\$440	\$58,564.00
Jordan L. Girasole, Summer Associate	N/A	4.8	\$305	\$1,464.00
Ryan J. Pugh, Summer Associate	N/A	4.4	\$305	\$1,342.00
Reagan F. Flynn, Paralegal	N/A	1.1	\$235	\$258.50
Celeyndiana Rodriguez, Paralegal	N/A	3.6	\$235	\$846.00
Alexander T. Cukier, Paralegal	N/A	63.0	\$235	\$13,524.25
Michele Klinger, Paralegal	N/A	20.6	\$235	\$4,841.00

SECTION II SUMMARY OF SERVICES

SERVICES RENDERED	HOURS	FEES
a) Asset Analysis and Recovery: Identification and review of potential assets including causes of action and non-litigation recoveries.	0	0
b) Asset Disposition: Sales, leases, abandonment and related transaction work.	0	0
c) Avoidance Action Litigation: Preference and fraudulent transfer litigation.	0	0
d) Business Operations: Issues related to debtor-in-possession operating in chapter 11 such as employee, vendor, tenant issues and other similar problems.	0	0
e) Case Administration: Coordination and compliance activities, including preparation of statement of financial affairs, schedules, list of contracts, United States Trustee interim statements and operating reports; contacts with the United States Trustee; general creditor inquiries.	122.5	\$57,666.00
f) Claims Administration and Objections: Specific claim inquiries; bar date motions; analyses, objections and allowance of claims.	10.5	\$5,061.50
g) Employee Benefits/Pensions: Review issues such as severance, retention, 401K coverage and continuance of pension plan.	0	0
h) Fee/Employment Applications: Preparations of employment and fee applications for self or others; motions to Establish interim procedures.	136.7	\$70,496.00
i) Fee/Employment Objections: Review of an objections to the employment and fee applications of others.	17.1	\$13,608.00
j) Financing: Matters under 361, 363 and 364 including cash collateral and secured claims; loan document analysis.	0	0
k) Litigation: Other than Avoidance Action Litigation (there should be a separate category established for each major matter).	383.5	\$237,582.00
l) Meeting of Creditors: Preparing for and attending the conference of creditors, the 341(a) meeting and other creditors' committee meetings.	0	0

SERVICES RENDERED	HOURS	FEES
m) Plan and Disclosure Statement: Formulation, presentation and confirmation; compliance with the plan confirmation order, related orders and rules; disbursement and case closing activities, except those related to allowance and objections to allowance of claims.	18.9	\$13,637.50
n) Relief from Stay Proceedings: Matters relating to termination or continuation of automatic stay under 362.	0	0
o) Accounting/Auditing: Activities related to maintaining and auditing books of account, preparation of financial statements and account analysis.	0	0
p) Business Analysis: Preparation and review of company business plan; development and review of strategies; preparation and review of cash flow forecasts and feasibility studies.	0	0
q) Corporate Finance: Review financial aspects of potential mergers, acquisitions and disposition of company or subsidiaries.	0	0
r) Data Analysis: Management information systems review, installation and analysis, construction, maintenance and reporting of significant case financial data, lease rejection, claims, etc.	0	0
s) Litigation Consulting: Providing consulting and expert witness services related to various bankruptcy matters such as insolvency, feasibility, avoiding actions; forensic accounting, etc.	0	0
t) Reconstruction Accounting: Reconstructing books and records from past transactions and bringing accounting current.	0	0
u) Tax Issues: Analysis of tax issues and preparation of state and federal tax returns.	0	0
v) Valuation: Appraise or review appraisals of assets.	0	0
w) Travel Time	53.9	\$15,145.75
SERVICE TOTALS	743.1	\$413,196.75

SECTION III SUMMARY OF DISBURSEMENTS

DISBURSEMENTS	AMOUNT
04/21/2023 - J & J Court Transcribers inv # 2023-00771 Transcript	\$2,226.40
06/05/2023 - J & J Court Transcribers inv # 2023-01182 Transcript	\$435.60
06/11/2023 - Transportation to federal courthouse for pre-trial logistics meeting-LRL	\$58.00
06/12/2023 - Transportation to federal courthouse for pre-trial logistics meeting-LRL	\$69.00
06/13/2023 - Travel to Court on 6/13 (46.8 mi. * \$0.655)-JFP	\$30.65
06/13/2023 - Parking at Court-JFP	\$20.00
06/13/2023 - Travel from Court on 6/13 (46.8 mi. * \$0.655)-JFP	\$30.65
06/14/2023 - J & J Court Transcribers inv # 2023-01270 Transcript	\$925.65
06/22/2023 - Transportation 6-22-2023-JNL	\$194.90
06/22/2023 - Late Night Dinner-JNL	\$23.00
06/22/2023 - PHV admission payment of 1 attorney	\$150.00
06/22/2023 - 2023 PHV payment to Lawyer's Fund of 1 attorney	\$239.00
06/23/2023 - J & J Court Transcribers inv # 2023-01352 Transcript	\$703.25
06/26/2023 - Courier Service- GP (6-23-2023)	\$38.58
06/26/2023 - Late Night Dinner-JNL	\$23.00
06/26/2023 - Courier Service -GP (6-23-2023)	\$38.58
06/27/2023 - Travel to/from Bankruptcy Court-JNL	\$58.95
06/27/2023 - Parking USBC-JNL	\$12.00
06/27/2023 - Late Night Meal-JNL	\$11.97
06/27/2023 - Dunkin run before LTL hearing-ATC	\$78.18
06/27/2023 - Parking at Court-JFP	\$12.00
06/27/2023 - Travel from Court on 6/27 (46.8 mi. * \$0.655)-JFP	\$30.65
06/27/2023 - Travel to Court on 6/27 (46.8 mi. * \$0.655)-JFP	\$30.65
06/27/2023 - Travel to court for MTD Trial 6/27-SAW	\$275.74
06/27/2023 - Supplies for attorneys at MTD trial 6/27-SAW	\$38.96
06/27/2023 - Travel from court for MTD Trial 6/27-SAW	\$160.03
06/28/2023 - Transportation from federal courthouse for motions-to-dismiss hearing-LRL	\$69.00
06/28/2023 - Parking at Court-JFP	\$12.00
06/28/2023 - Travel to Court on 6/28 (46.8 mi. * \$0.655)-JFP	\$30.65
06/28/2023 - Travel from Court on 6/28 (46.8 mi. * \$0.655)-JFP	\$30.65
06/28/2023 - Travel to/from USBC-JNL	\$58.95
06/28/2023 - Dunkin run before LTL hearing-ATC	\$75.51
06/28/2023 - Parking USBC-JNL	\$20.00
06/29/2023 - Transportation from federal courthouse for motions-to-dismiss hearing-LRL	\$58.00
06/29/2023 - Travel to Court on 6/29 (46.8 mi. * \$0.655)-JFP	\$30.65
06/29/2023 - Travel from Court on 6/29 (46.8 mi. * \$0.655)-JFP	\$30.65
06/29/2023 - Parking at Court-JFP	\$12.00

06/29/2023 - Late Night Dinner-JNL	\$11.97
06/29/2023 - Dunkin run before LTL hearing-ATC	\$75.51
06/29/2023 - Parking USBC-JNL	\$12.00
06/29/2023 - Travel to/from USBC-JNL	\$58.95
06/30/2023 - J & J Court Transcribers inv # 2023-01396 Transcript	\$4,011.15
06/30/2023 - Travel to/from USBC-JNL	\$58.95
06/30/2023 - Parking USBC-JNL	\$12.00
06/30/2023 - Dunkin run before LTL hearing-ATC	\$70.74
06/30/2023 - Hotel room at Westin for LTL trial-ATC	\$893.32
06/30/2023 - Travel to Court on 6/30 (46.8 mi. * \$0.655)-JFP	\$30.65
06/30/2023 - Travel to court for MTD Trial 6/30-SAW	\$271.90
06/30/2023 - Travel from court for MTD Trial 6/30-SAW	\$16.75
06/30/2023 - Travel from Court on 6/30 (46.8 mi. * \$0.655)-JFP	\$30.65
06/30/2023 - Parking at Court-JFP	\$12.00
06/30/2023 - Amtrak ride back home from LTL trial-ATC	\$194.00
DISBURSEMENTS TOTALS	\$12,103.99

SECTION IV CASE HISTORY

1. Date of Retention: June 14, 2023, effective as of April 4, 2023 [Dkt. 770] (the “Retention Order”).¹
2. Summary explaining the nature of the work performed and the results achieved:
 - Facilitated the drafting, finalization and filing of several documents, including: (i) letters to Judge Kaplan regarding discovery and scheduling issues, (ii) motion to waive 3003-1 rule requirements, (iii) motion to extend and modify the preliminary injunction order and application to shorten time, (iv) designation of record on appeal from district court appeals cases, (v) supplemental certifications and omnibus declaration in support of retention applications, (vi) notices of appearance, corporate disclosure statements, certificates of service, and applications for admission *pro hac vice* for Debtor’s professionals in the district court appeals cases, (vii) applications for admission *pro hac vice* for Debtor’s professionals in the main case, (viii) monthly fee statements for the Debtor’s professionals, (ix) motion for an order authorizing retention and compensation of ordinary course professionals, (x) motion to establish bar dates and related procedures, (xi) amended chapter 11 plan, (xii) objection to motion to terminate the Debtor’s exclusive periods, (xiii) objections to motion to preclude expert testimony, (xiv) response to TCC’s objections to Debtor’s deposition designations, (xv) reply in support of motion regarding ACH expense reimbursement agreement, (xvi) response to Paul Crouch objection to proffered expert testimony, (xvii) sur-reply in support of omnibus objection to motions to dismiss and motion to seal, (xviii) hearing agendas, (xix) monthly operating report, (xx) objections to TCC’s exhibit lists for hearing on the motions to dismiss, (xxi) exhibit lists for hearing on the motions to dismiss, (xxii) response to MRHFM’s objection to Debtor’s declarations, (xxiii) reply in support of motion to extend and modify the preliminary injunction order, and (xxiv) certificates of service in the district court appeals cases;
 - Analyzed issues and counseled the Debtor with respect to, among other things, (i) retention of the Debtor’s professionals, (ii) chapter 11 case and adversary proceeding, (iii) mediation, (iv) recently opened appeals cases of the preliminary injunction and FCR appointment orders and (v) discovery;
 - Participated in the hearings and conferences held during this period, including the motion to dismiss hearings, and counseled the Debtor with respect thereto;
 - Monitored main case and adversary proceeding dockets; and

¹ The Retention Order is attached hereto as Exhibit A.

- Interfaced on a daily basis with the Debtor and/or its other professionals to facilitate the Debtor's administrative processes, including adherence to the local bankruptcy rules and filing procedures.

I certify under penalty of perjury that the above is true.

Date: August 4, 2023

/s/ Paul R. DeFilippo
Paul R. DeFilippo